BEFORE THE DEPARTMENT OF TRANSPORTATION WASHINGTON, D.C.

In the Matter of)	
2007/2008/2009 U.SChina Air Services and Combination Frequency Allocation Proceeding))))	Docket DOT-OST-2007-28567

MOTION OF UNITED AIR LINES, INC.

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Counsel for UNITED AIR LINES, INC.

DATED:

October 19, 2007

NOTICE:

United is requesting expedited action on this motion and will poll the carrier representatives on the attached Service List and inform the Department of the results of its polling.

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By this motion, United Air Lines, Inc. ("United") requests that Order 2007-9-25, allocating to United seven weekly U.S.-China combination frequencies, be amended to allow United to begin San Francisco-Guangzhou service no later than June 30, 2008, the start of the peak summer 2008 travel season, rather than by March 25, 2008. In support of this Motion, United submits the following:

1. By Order 2007-9-25, the Department granted United's unopposed application for the seven weekly U.S.-China combination frequencies available on March 25, 2008, for daily San Francisco-Guangzhou service. The Order requires United to begin service on the date those frequencies nominally become available -- March 25, 2008 -- although consistent with "standard practice" it provides for "a 10-day leeway" by "allow[ing] United to inaugurate service within 10 days of March 25, 2008 (*i.e.*, by April 4, 2008)." *Id.* at 9, fn. 37.

- 2. As the first U.S. carrier to provide nonstop service between the United States and Guangzhou, United will need to invest a significant amount of time and resources to develop its service on this route. Shifting the start-up date for its San Francisco-Guangzhou service from March 25, 2008 (the technical beginning of the IATA Summer 2008 traffic season) to June 30, 2008 (the beginning of the peak travel season) will provide United with additional time to develop its service and promote this new route and destination. 1/
- 3. An extension of the start-up date to June 30, 2008, will not prejudice any other carrier. United's application for the seven weekly frequencies available on March 25, 2008, was unopposed, and no carrier objected to the award of those frequencies to United by Order 2007-9-25.

WHEREFORE, for the foregoing reasons, United respectfully requests that the Department amend Order 2007-9-25 awarding to United seven weekly U.S.-China combination frequencies available on March 25, 2008, to extend the start-up date for using those frequencies from March 25, 2008, to June 30, 2008, and that the Department grant such other and further relief as it may deem necessary and appropriate.

¹/ Even though United is seeking a change in the start up date until June 30, United anticipates starting nonstop service on the route during the first two weeks in June. Setting the date at the end of the month, however, will provide United additional planning flexibility to coordinate the start up with other flight and crew scheduling changes to be implemented in June of next year, while still ensuring that the new service is up and running throughout the peak summer travel season.

Respectfully submitted,

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DATED: October 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Motion of United Air

Lines, Inc. on all persons named below by causing a copy to be sent via email:

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Caryn Garvin

DATED: October 19, 2007